



January 22, 2024

Hon. Peggy Kuo
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201
VIA ECF ONLY

Re: *Shkolir, et. al v. RX2GO, Inc., et. al.*; 1:23-cv-7256-OEM-PK (EDNY)
MOTION TO EXTEND TIME TO FILE MOTION TO AMEND COMPLAINT


Your Honor:

I represent the Plaintiffs in the above-referenced action. Pursuant to Your Honor's Minute Entry and Order of January 3, 2025, the deadline for Plaintiffs to file their Motion to Amend their Second Amended Complaint is January 24, 2025, with any opposition by Defendants to be due by January 31, 2025. Plaintiffs respectfully request an extension of 3 weeks, to February 14, 2025, and February 21, 2025, respectively.

The reason for this request is that the parties have recently reengaged in settlement discussions and think there is a chance we might be able to settle without incurring further fees and costs in litigation. Opposing counsel consents to this request.

Pursuant to the Court's individual practice standards, the following is offered:

- a. The original date to file Third Amended Complaint: January 24, 2025; and Defendants' response by January 31, 2025.
- b. The reason for the request: See above.
- c. The number of previous requests for adjournment or enlargement: None for this motion.

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- d. Whether these previous requests were granted or denied: N/A
- e. Whether the adversary consents, and, if not, the reasons given by the adversary for refusing to consent: Opposing counsel consents to this request.

This request is not anticipated to impact or affect any other immediate deadlines in this case. Our current discovery deadline is March 31, 2025. The parties are likely to move the Court for that deadline to be extended for good cause later on if our settlement efforts are not successful, but that would likely be the case even without this request.

Thank you for your consideration.

Sincerely,



Penn Dodson, Esq.

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